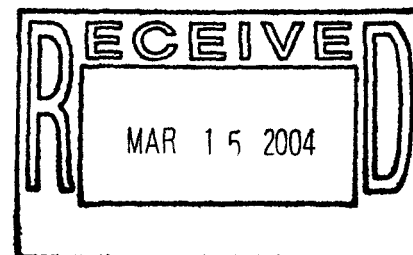


Closure Description Document
For Partial Closure Of Resource Conservation and
Recovery Act (RCRA) Interim Status
Unit 18.01 – Remedial Action Decontamination Pad

U S Department of Energy
Rocky Flats Environmental Technology Site
EPA ID No CO7890010526



DOCUMENT CLASSIFICATION
REVIEW: N/A, V, R, P, H
CLASSIFICATION: P, H, V

ADMIN RECORD

LA-A-002012

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1 0 INTRODUCTION

1.1 Purpose and Scope

The Rocky Flats Environmental Technology Site's (RFETS) "Closure Plan for Interim Status Units at RFETS," Rev 2/15/2000, addresses closure of interim status units. Removal of the unit is subject to the Closure Plan and to a subsequent Closure Description Document that identifies the portions or sections of the Closure Plan that is applicable to the specific interim unit closure.

This Closure Description Document applies to the portion of the unit that remains after partial closure was completed in 1996 (96-DOE-03025), and includes the concrete pad containing a sump used for the collection of environmental liquids and sediments. Clean closure decontamination, or removal, as appropriate will accomplish closure of these portions of the system.

Unit Closure Notification and Schedule

The Colorado Department of Public Health and Environment (CDPHE), Hazardous Materials and Waste Management Division is hereby notified of the Site's intent to conduct closure on the remainder of the unit identified in Section 4.0. The submittal of this notification is at least 45 days prior to the beginning of closure activities. Closure activities for this unit are expected to be scheduled to start after March 15, 2004, and are tied to the Site closure baseline (see attached project schedule).

Within 30 days after completion of partial closure activities a summary report will be submitted to CDPHE containing details about the removal of the specified components of the unit.

1 2 Facility Contacts

The contacts for closure activities at RFETS in the Remediation, Industrial D&D, & Site Services project are:

Assistant Manager
For Environmental and Stewardship
Rocky Flats Field Office
U S Department of Energy
10808 Highway 93, Unit A
Golden, CO 80403-8200
(303) 966-2282

Environmental Manager
Remediation, Industrial
D&D, & Site Services
Kaiser-Hill Company, L L C
10808 Highway 93, Unit B
Golden, CO 80403-8200
(303) 966-6386

2.0 METHOD OF CLOSURE AND PERFORMANCE STANDARD

The components of the interim status system described herein will be closed by the method described as clean closure by decontamination in the Closure Plan, Section C. The performance standard is decontamination of the system components to achieve compliance with performance standards identified in RFCA Attachment 5, Table 2, Tier II - Ground Water Action Levels. If clean closure

performance standards cannot be achieved, the concrete, sump, and grate will be removed and managed as hazardous waste

3.0 SYSTEM DESCRIPTION AND WASTE CHARACTERIZATION

The Remedial Action Decontamination Pad (RADP) supported the Environmental Restoration (ER) activities at RFETS, and was used to decontaminate field equipment. The RADP consisted of three functional areas: (1) the equipment decontamination pad, (2) the environmental liquids management area, and (3) the drum transfer area. In 1996, partial closure of this unit was completed by "debris rule" decontamination. The portion of the RADP that did not go through closure in 1996 includes the concrete pad and the sump. This portion of the unit was used in association with a tank and transfer system that was built after the 1996-closure action, for decontamination of field equipment from non-RCRA remedial actions.

The pad is constructed of concrete and painted with epoxy paint. The pad slopes to a sump located in the center of the pad. The sump is approximately 15 inches deep and covered with a metal grate. A four inch concrete berm is along the sides of the pad and a collapsible curtain suspended on steel poles was used to catch overspray and contain the liquid to the area within the berm. Additionally, since the support poles for the curtains and the shed structure are outside of the curtains, the shed and poles were protected from contamination and are not considered part of the unit.

The following table, Table 3-1, identifies the RCRA waste codes, the contaminants of concern, and the Tier II levels associated with interim status unit 18 01.

Table 3-1

EPA Waste Code	Contaminants of Concern	Tier II Ground Water Action Level
D004	Arsenic	5.00E-02 mg/L
D005	Barium	2.00E+00 mg/L
D006	Cadmium	5.00E-03 mg/L
D007	Chromium	1.00E-01 mg/L
D008	Lead	1.50E-02 mg/L
D009	Mercury	2.00E-02 mg/L
D011	Silver	1.83E-01 mg/L
D019	Carbon tetrachloride	5.00E-03 mg/L
D022	Chloroform	1.00E-01 mg/L
F001	Listed spent halogenated	Action level varies with

EPA Waste Code	Contaminants of Concern	Tier II Ground Water Action Level
	solvents used in degreasing	solvents**
F002	Listed spent halogenated solvents	Action level varies with solvents**
F003	Listed spent non-halogenated solvents	Action level varies with solvents**
F005	Listed spent non-halogenated solvents	Action level varies with solvents**

**Analytical results will be evaluated for various components of each solvent associated with the RCRA waste code

4.0 SPECIFIC CLOSURE ACTIVITIES

Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions, with engineering, health and safety, and waste management information, will be developed prior to start of closure activities. These instructions will be developed in accordance with applicable RFETS policies and procedures. Closure activities are summarized as follows:

4.1 Establishment of System Boundaries and Scope of Removal

The boundaries for the interim status unit that will be decontaminated for clean closure and disposed of as sanitary waste include 1) the concrete pad, and 2) the sump including the metal grating. A typical decontamination solution will be used, and applied manually. This defines the extent of closure activities for this closure description document.

The containment curtains are the same manufacture as the curtains that were used at RCRA Unit 788.3, and those curtains failed TCLP analysis for cadmium, chromium, and lead. Therefore, the curtains will be rinsed and they will be disposed of as hazardous waste with the EPA codes of D006, D007, and D008 applied to this wastestream.

The decontamination rinsate will be managed as hazardous waste and managed at the AWTs. The final rinsate volume will not exceed two gallons per 100 square feet of surface area, and must completely contact the surfaces that came in contact with hazardous waste. This final rinsate will be collected and analyzed to show that the contaminants of concern (see Table 3-1) are below the RFCA Attachment 5, Tier II – Groundwater Action Levels, and the pH is between 6 and 9. This rinsate will be managed based on analytical results.

4.2 Preparation of Engineering and IWCP Work Packages

A unit specific IWCP/engineering work package will be prepared for removal of these components. The RFETS Health and Safety Practices Manual defines general health and safety measures to be followed at the Site. Closure activities will be conducted in accordance with this manual, incorporating the results of job specific industrial and nuclear safety related evaluations and screens.

The IWCP/engineering work package and Radiological Work Permit, if necessary, will be used to control work, including specification of personal protective equipment, methods of component removal and size reduction, methods for containing any liquids or preventing releases to the environment, and waste packaging. As Low As Reasonably Achievable (ALARA) principles will be followed regarding personnel exposure to radiation. Radiological containment will be provided, if necessary, by using soft-sided structures such as glovebags, sleeves and/or portable housing.

5 0 DISPOSITION OF CLOSURE WASTES

It is anticipated that hazardous rinsate, clean rinsate, and sanitary wastes will be generated during closure activities. It is assumed that the Site waste management systems will be available to receive wastes generated by these closure activities. The liquids generated during the closure activities, including any used during decontamination efforts, will be handled as addressed in Section 3 0.

Wipes, other combustibles used to immobilize free liquids, wipes used to decontaminate and PPE will be managed as hazardous waste and will be characterized in accordance with applicable regulations. All waste containers will be stored in an appropriate onsite storage area prior to offsite disposal.

6 0 SOIL CONTAMINATION EVALUATION AND POST CLOSURE CARE

Historical information shows that no releases have occurred to the soil at interim status unit 18 01. Closure activities for these components are not expected to impact the soils surrounding the area. Therefore, soil contamination will be evaluated as part of decommissioning and cleanup activities for the 903A complex under RFCA, and post closure care activities are not necessary as part of the closure of this unit.

7 0 RECORDKEEPING

The following closure records will be maintained on Site during closure activities and at a federal repository for a minimum of 30 years following the report of closure.

- Record of sampling activities including type, number and date of samples,
- Analytical results,
- Work instructions used to conduct closure activities and documentation verifying closure activities were conducted in accordance with the

Closure Plan for Interim Status Units at RFETS and this Closure
Description Document,

- Records of the volume of hazardous waste generated during closure

8 0 AMENDMENT OF THE CLOSURE DESCRIPTION DOCUMENT

In conducting closure activities, unexpected events that are identified during implementation of closure activities may require an amendment to this Closure Description Document. Modifications to this Closure Description Document will be made in accordance with applicable regulations.

9 0 REFERENCES

- 1 Code of Colorado Regulations, Vol 6, No 1007-3
- 2 Closure Plan for Interim Status Units at the Rocky Flats Environmental Technology Site, Revised February 15, 2000
- 3 Rocky Flats Cleanup Agreement (RFCA), July 19, 1996
- 4 Certification of Partial Closure for the Remedial Action Decontamination Pad Tanks RCRA Unit 18 01, 96-DOE-03025, November 12, 1996